



United States Steel Corporation
Clairton Works
400 State Street
Clairton, PA 15025

March 31, 2009

RECEIVED Project No. AC0-125

APR 09 2009

James Thompson
Allegheny County Health Department
Bureau of Air Pollution Control
301 39th Street
Pittsburgh, Pennsylvania 15201

Protection Division (3412)

RE: Semi-Annual Report as Required by 40 CFR, Part 61, §61.138 of Subpart L and 40 CFR, Part 61, §61.247 of Subpart V for the Reporting Period of July 2008 through December 2008

To Mr. Thompson:

This report is being sent to the Department as a statement that the U.S. Steel Corporation, Clairton Works has fulfilled all provisions of 40 Code of Federal Regulations (CFR), Part 61, Subparts L and V for the reporting period of July 2008 through December 2008. The report has been prepared to meet the reporting requirements of 40 CFR, Part 61, §61.138 and 40 CFR, Part 61, §61.247.

Monthly audits of equipment in benzene service as defined in 40 CFR, Part 61, Subpart L and V have been conducted in accordance with Environmental Protection Agency (EPA) Reference Method 21, *Determination of Volatile Organic Compound Leaks*. Results of these monitoring events, including total components monitored and total leaking components identified, can be found in Table 1. No leaks to any of the components were left unrepaired, and all leaks were fixed in the mandated 5/15 day period. Clairton Works does not have any valves subject to the alternative standards of 61-243-1 or 61-243-2.

An audit of gas blanketing vessels was conducted on September 23, 2008. Five (5) leaks were discovered. Leaks were repaired and verified to have been fixed on September 30, 2008 or October 8, 2008 by demonstrating an OVA reading under 500 ppm, as Methane. No abnormalities in the blanketing systems were found. Attempts to repair all of the leaks were within five days of discovery, and final repairs were within fifteen days. All repairs were verified by re-screening procedures identified in Method 21.

If you should have any questions or comments, please call me at your convenience at (412) 233-1015.

Sincerely,

Coleen M. Davis
Senior Environmental Control Engineer

cc: Jim Hagedorn—USEPA Region III

Table 1.

Summary of Total Equipment Monitored and Leaks Detected, Equipment in Benzene Service,
July 2008 through December 2008, USS Clairton Works, Clairton, Pennsylvania

Monitoring Dates		Jul	Aug	Sep	Oct	Nov	Dec
		2nd	11th, 12th, and 21st	23rd	8th and 20th	11th and 12th	4th
Valves	Components Monitored	0	2092	2	121	2092	3
	Leaks Detected	0	2	0	3	2	1
	Components Not Repaired in 5/15 Period	0	0	0	0	0	0
	Components Requiring Delay of Repair	0	0	0	0	0	0
Pumps	Components Monitored	18	18	18	18	18	18
	Leaks Detected	0	0	0	0	0	0
	Components Not Repaired in 5/15 Period	0	0	0	0	0	0
	Components Requiring Delay of Repair	0	0	0	0	0	0
Exhausters	Components Monitored	0	34	0	0	34	0
	Leaks Detected	0	0	0	0	0	0
	Components Not Repaired in 5/15 Period	0	0	0	0	0	0
	Components Requiring Delay of Repair	0	0	0	0	0	0